

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**SECURITIES INVESTOR PROTECTION  
CORPORATION,**

Plaintiff-Applicant,

v.

**BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,**

Defendant.

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In re:

**BERNARD L. MADOFF,**

Debtor.

**IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,**

Plaintiff,

v.

**BSI AG, individually and as successor-in-interest  
to BANCO DEL GOTTARDO,**

Defendant.

Adv. Pro. No. 08-01789 (SMB)

**SIPA LIQUIDATION**

(Substantively Consolidated)

Adv. Pro. No. 12-01209 (SMB)

**STIPULATION EXTENDING TIME TO RESPOND  
AND ADJOURNING THE PRE-TRIAL CONFERENCE**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which defendant BSI AG (“Defendant”) may move, answer, or otherwise respond to the Trustee’s complaint (“Complaint”) is extended up to and including November 21, 2014. The pre-trial conference will be adjourned from December 17, 2014, at 10:00 a.m. to January 28, 2015, at 10:00 a.m.

The purpose of this stipulated extension (“Stipulation”) is to provide additional time for Defendant to answer, move against, or otherwise respond to the Complaint. Nothing in this Stipulation is a waiver of Defendant’s right to request from the Court a further extension of time

to answer, move against, or otherwise respond to the Complaint and/or the Trustee's right to object to any such request.

The parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction and any rights regarding any pending motion.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photocopy, or electronic copy of this Stipulation shall be deemed an original. This Stipulation is entered into pursuant to the Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences (Adv. Pro. No. 08-01789 (SMB), Dkt. No. 7037).

Dated: October 9, 2014  
New York, New York

/s/ Thomas L. Long  
**BAKER & HOSTETLER LLP**  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Email: [dsheehan@bakerlaw.com](mailto:dsheehan@bakerlaw.com)  
Thomas L. Long  
Email: [tlong@bakerlaw.com](mailto:tlong@bakerlaw.com)  
Mark A. Kornfeld  
Email: [mkornfeld@bakerlaw.com](mailto:mkornfeld@bakerlaw.com)

/s/ George W. Shuster, Jr.  
**WILMER CUTLER PICKERING HALE  
AND DORR LLP**  
7 World Trade Center  
250 Greenwich Street  
New York, New York 100072  
Telephone: (212) 230-8800  
Facsimile: (212) 230-8888  
Charles C. Platt  
Email: [charles.platt@wilmerhale.com](mailto:charles.platt@wilmerhale.com)  
George W. Shuster, Jr.  
Email: [george.shuster@wilmerhale.com](mailto:george.shuster@wilmerhale.com)

*Attorneys for BSI AG*

*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA  
Liquidation of Bernard L. Madoff Investment  
Securities LLC and Bernard L. Madoff*